



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 31, 2011

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: Update to the Regulatory Interpretation Request:
Clarification of "Corrosion Expert" and "Cathodic Protection Tester"

FROM: Carolyn Hoskinson, Director
Office of Underground Storage Tanks

A handwritten signature in black ink, appearing to read "Hoskinson", is placed over the printed name and title of the sender.

TO: EPA UST/LUST Regional Program Managers
State UST Managers

This memorandum updates the Office of Underground Storage Tank's (OUST) April 16, 2001 memorandum titled *Update to the Regulatory Interpretation Request: Clarification of "Corrosion Expert" and "Cathodic Protection Tester."* Since OUST issued that memorandum, NACE International changed their certification categories. In particular, they added a new certification category, cathodic protection technologist.

The Environmental Protection Agency (EPA) believes the new certification category fits EPA's definition of cathodic protection tester (§ 280.12) but does not meet EPA's definition of corrosion expert (§ 280.12). We believe cathodic protection technologist does not meet the definition of corrosion expert because the skill assessment description contained in the NACE International literature requires only the design and installation of simplistic forms of galvanic and impressed current cathodic protection facilities. EPA believes cathodic protection systems at underground storage tank (UST) facilities can be complex and therefore, to be considered a corrosion expert, certifications must include skills to design complex cathodic protection systems. The attached table lists the NACE International certifications and shows where each certification fits into EPA's corrosion expert and cathodic protection tester definitions. This table updates the table provided in the April 16, 2001 memorandum which is available on EPA's website at: www.epa.gov/oust/compend/adn.htm (question 30).

As always, state agencies may impose requirements that are more stringent than the federal regulation. Owners and operators of UST facilities and members of the contracting community should confer with their state UST program offices to determine whether they interpret corrosion expert and cathodic protection tester definitions differently.

If you have any questions on this issue, please contact Paul Miller (703-603-7165 or miller.paul@epa.gov) of my staff. For information on NACE International's accreditation programs and descriptions of each certification category, please contact NACE International at (281) 228-6200 or visit their website at: www.nace.org.

Attachment

cc: Kim Ray, NACE International
Kathy Nam, OGC
OUST Regional Liaisons

Attachment: NACE International Certification Levels That Meet EPA's Definitions Of Corrosion Expert And Cathodic Protection Tester

<i>EPA Definition (40 CFR Part 280.12)</i>	<i>NACE Certification</i>
CORROSION EXPERT EPA's definition requires NACE certification unless the person is a registered professional engineer (PE) with certification or licensing that includes education and experience in corrosion control of buried or submerged metal piping systems and metal tanks. Please check with state and local authorities to determine if their requirements are more stringent.	Corrosion Specialist
	Cathodic Protection Specialist
CATHODIC PROTECTION TESTER EPA's definition of cathodic protection tester does not require any specific certification; however, it does require education and experience in various corrosion areas. Persons holding these NACE certification levels are viewed by EPA as fully meeting regulatory requirements. Please check with state and local authorities to determine if their requirements are more stringent. Note: Persons meeting EPA's definition of corrosion expert would also be considered as meeting EPA's definition of cathodic protection tester.	Cathodic Protection Technologist
	Cathodic Protection Technician
	Cathodic Protection Tester
	Senior Corrosion Technologist
	Corrosion Technologist
	Corrosion Technician*

*Please note that NACE requires a *Corrosion Technician* performing as a CATHODIC PROTECTION TESTER be directly supervised by a *Corrosion Technologist*, *Senior Corrosion Technologist*, *Cathodic Protection Specialist*, or *Corrosion Specialist*.